

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**CUREN ESSEX, ALICIA BULKO,  
SUSAN COOK, ELIZABETH ZUBOR,  
and SUSAN TERRELL,**  
Plaintiff,

**V**

**CASE NO. 09-11095  
HON. ARTHUR J. TARNOV**

**LIVINGSTON COUNTY, a municipal corporation,  
ROBERT BEZOTTE in his individual capacity as  
the Livingston County Sheriff, TOM CREMONTE  
in his individual capacity as the Livingston County  
Jail Administrator, and RANDY BOOS, in his  
individual capacity, Jointly and Severally,**  
Defendant.

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**CERTIFICATE OF ATTEMPT TO OBTAIN  
THE DISCOVERY REQUIRED WITHOUT COURT ACTION**

Plaintiff's counsel, Kenneth G. McIntyre, has left phone messages for Mr. Seward, following up upon his (McIntyre's) letter of May 19, 2011 to Mr. Seward, asking him to agree to provide the discovery sought in Ms. Terrell's March 7, 2011 First Set of Interrogatories and Request for Production of Documents. No response to those phone messages and letter has been received. Based upon defense counsel's June 28, 2011 response to Plaintiff's March 7, 2011 Interrogatories and Request for Production of Documents, Plaintiff's counsel has concluded that his good faith efforts to confer with defense counsel will not result in voluntary compliance with those discovery requests, and, therefore, Plaintiff's counsel certifies that his efforts were made and have failed, so he must seek the help of this court to obtain responsive answers to Plaintiff's March 7, 2011 discovery requests.

Certified to this 29th day of  
July, 2011

/s/ Kenneth G McIntyre  
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